

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**BRIANNA JONES,**

Plaintiff,

v.

**MONTGOMERY COUNTY YOUTH  
CENTER, and MONTGOMERY  
COUNTY, and JOEL SPRINGER,**

Defendants.

**CIVIL NO. 2:19-cv-04216-GJP**

**PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT AGAINST  
DEFENDANT JOEL SPRINGER PURSUANT TO FED.R.CIV.P. 55**

**TO THE CLERK:**

Pursuant to the Federal Rules of Civil Procedure 55, Plaintiff respectfully requests this Honorable Court to enter Default against the Defendant, Joel Springer, for failure to answer or otherwise plead to the allegations of this Civil Action within the time required by the rules or as extended by court order.

Respectfully submitted,

/s/ Samuel A. Anyan, Jr.

Samuel A. Anyan, Jr., Esquire  
**Wapner Newman**  
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**Date: November 9, 2020**

*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I, Samuel A. Anyan, Jr., Esquire, hereby certify that on this 9<sup>th</sup> day of November 2020, caused a true and correct copy of Plaintiff's Request for Default Pursuant to Fed.R.Civ.P. 55 to be filed with the Clerk of Court via the Court's CM/ECF filing system, and served on the *pro se* Defendant via Certified Mail Return Receipt Requested and First-Class Mail as addressed below:

Joel Springer  
8430 N. Pickering Avenue  
Philadelphia, PA 19150  
*Pro Se Defendant*

/s/ Samuel A. Anyan, Jr.

Samuel A. Anyan, Jr., Esquire  
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**Dated:** November 9, 2020

*Attorney for Plaintiff*